

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

RECURSIVE WEB TECHNOLOGIES LLC,

Plaintiff,

v.

**PINNACLE VIDEO GROUP, INC. DBA
AIRCHECK NEWS TAPING SERVICE,**

Defendant.

CIVIL ACTION NO. 5:19-cv-323

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

1. This is an action for patent infringement in which Recursive Web Technologies LLC makes the following allegations against Pinnacle Video Group, Inc. dba Aircheck News Taping Service.

PARTIES

2. Plaintiff Recursive Web Technologies LLC (“Plaintiff”) is a Delaware limited liability company with its principal place of business at 101 E. Park Blvd, Suite 600, Plano, TX 75074.

3. On information and belief, Pinnacle Video Group, Inc. dba Aircheck News Taping Service (“Defendant” or “Aircheck”) is a corporation organized and existing under the laws of the State of Texas, with its principal place of business in San Antonio, TX. It may be served with process through its registered agent, Malcolm Holzmann, 407 6th St, San Antonio, TX 78215.

JURISDICTION AND VENUE

4. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b). Aircheck is a Texas corporation, and, thus, resides in Texas and in this District.

6. On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to its substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this Judicial District.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 8,244,661

7. Plaintiff is the owner of United States Patent No. 8,244,661 ("the '661 patent") entitled "System and Method for Facts Extraction and Domain Knowledge Repository Creation From Unstructured and Semi-Structured Documents." The '661 Patent issued on August 14, 2012. A true and correct copy of the '661 Patent is attached as Exhibit A.

8. Defendant owns, uses, operates, advertises, controls, sells, and otherwise provides products and/or services that infringe the '661 patent. The '661 patent provides, among other things, "A method of time stamp extraction and verification, comprising: parsing a page and representing it as a sequence of paragraphs; and building list of candidates for time stamp for each paragraph by extraction of valid triads representing year, month and day."

9. Defendant directly and/or through intermediaries, made, has made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or services that infringed one or more claims of the '661 patent, including at least Claim 1, in this district and elsewhere in the United States. By making, using, importing, offering for sale, and/or selling such products and services, and all like products and services, Defendant has injured Plaintiff and is thus liable for infringement of the '661 patent pursuant to 35 U.S.C. § 271.

10. AirCheck performs and induces others to perform a method of time stamp extraction and verification. For example, AirCheck provides AirTrack On-Demand Portal for media monitoring which extracts news data along with date ("time stamp"), time and/or title and displays it to a user.



Source: <https://airchecknews.com/>



Home Services Coverage Contact

(210) 342-5900


AirCheck Media Monitoring



Our customizable media monitoring portal allows you 24/7 access to all of your subscription information - TV, Radio, Online Print and Social Media. Available from any web browser, our executive console lets you view, organize, share and analyze all your media simply and efficiently.

(Click video at left to view demo)

Source: <https://airchecknews.com/services>



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Our Services

AirTrack On-Demand Portal


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Monitoring Reports


Keep on top of important information about you, your clients or your competition. Media coverage reports include data from local and national broadcast, cable and syndicated outlets, local and national radio programming, internet, social media, traditional and online print. Enhance your custom report with Nielsen audience, ad and publicity values and other valuable metrics to help quantify your coverage.

Preview

Near-real time online preview of TV and radio from local and national news sources is available within minutes after airing. Our Edit From Preview system allows you to clip and save your story permanently in a variety of qualities and formats.




Source: <https://airchecknews.com/services>



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Content Analysis

Manage your coverage with our [executive dashboard](#) and tools for customized coverage reports and content analysis from a single, user-friendly console. Categorize, sort, filter and search your stored files, then create eye-catching charts, graphs and reports to display and share your results.

Video & Audio Clips

Broadcast archive clips from all [210 local TV markets](#), national broadcast, cable, syndicated programming and thousands of hours of local and national radio outlets. Most programming is available for digital delivery within minutes of airing.

Audience Measurement & Ad Value

Program-specific audience and ad rate calculations provide critical measurement of the reach and value of your broadcast coverage. Coverage reports provide automatic tabulations of available metrics to provide quick and easy access to this vital information.

Source: <https://airchecknews.com/services>

Source: https://www.youtube.com/watch?time_continue=36&v=e0JG9nZTY_o

11. AirCheck performs and induces other to perform the step of parsing a page and representing it as a sequence of paragraphs. For example, the AirTrack On-Demand Portal parses the news data from various websites/webpages and represents the content as a sequence of paragraphs.

AirTrack On-Demand Portal
Our customizable media portal allows you 24/7 access to all of your subscription information - TV, Radio, Online and Traditional Print, and Social Media. Available from any web browser, our [executive console](#) lets you view, organize, share and analyze all your media simply and efficiently.

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Audience Measurement & Ad Value

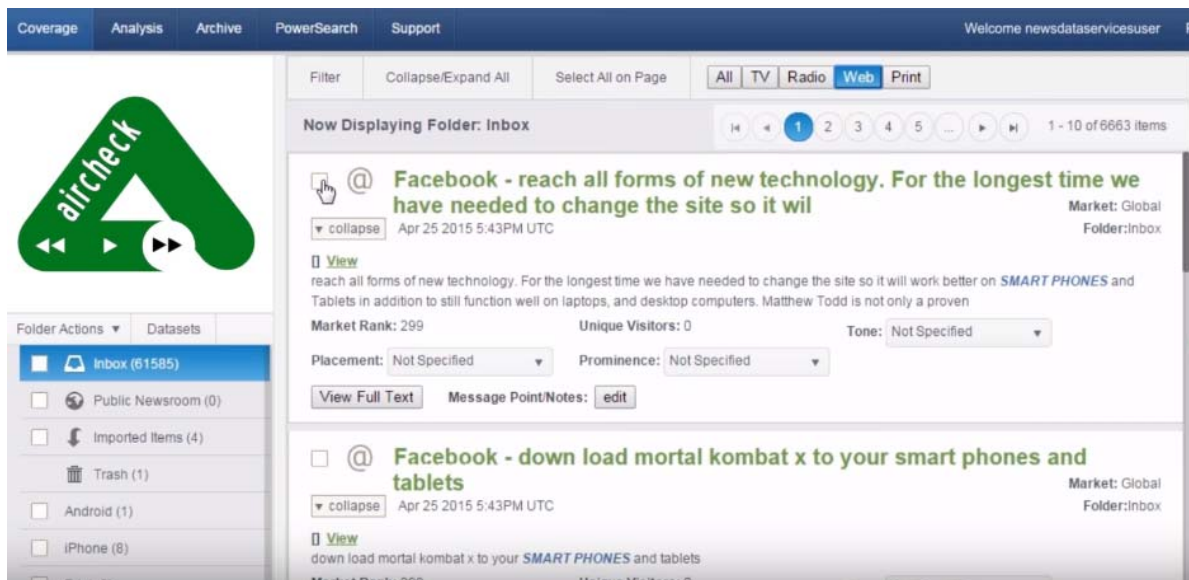
Program-specific audience and ad rate calculations provide critical measurement of the reach and value of your broadcast coverage. Coverage reports provide automatic tabulations of available metrics to provide quick and easy access to this vital information.

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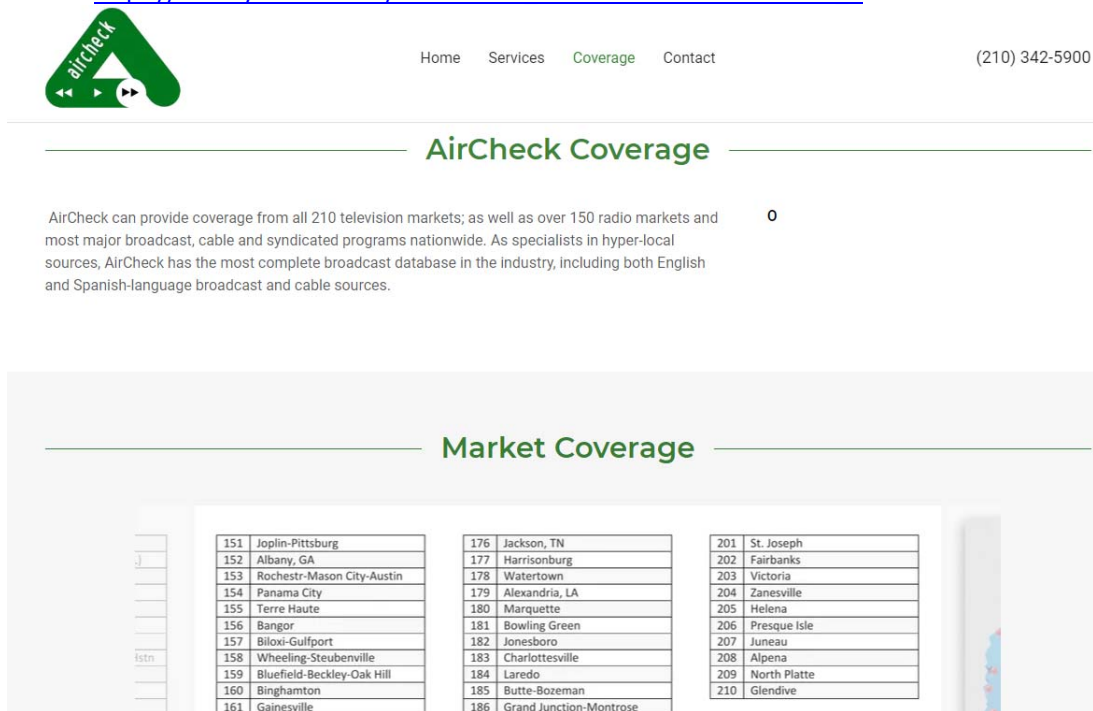
The screenshot displays the Aircheck web application interface. On the left is a sidebar with the Aircheck logo and a folder tree. The main content area shows a list of broadcast clips. The first clip is titled "NY1 - NEWS ALL DAY" and the second is "MTV - MTV 2-2:30PM". Each clip entry includes a "collapse" button, a timestamp, a "Preview/Edit Clip" link, and a detailed summary of broadcast metrics.

Clip Title	Market	Folder	Timestamp	Preview/Edit	Market Rank	Nielsen Audience	Runtime	30 Sec. Ad Equivalency	Calc Ad Value	Calc Publicity Value	Tone	Placement	Prominence
NY1 - NEWS ALL DAY	New York, NY	Inbox	May 08 2015 2:00PM ET	[08:19] Preview/Edit Clip	1	21,243	00:00:17	\$300.00	\$170.00	\$510.00	Not Specified	Beginning	Not Specified
MTV - MTV 2-2:30PM	National	Inbox	May 08 2015 2:00PM CT	[01:57] Preview/Edit Clip	N/A	197,444	00:00:11	\$4,604.00	\$1,688.00	\$5,064.00	Not Specified	Beginning	Not Specified

Source: https://www.youtube.com/watch?time_continue=36&v=e0JG9nZTY_o



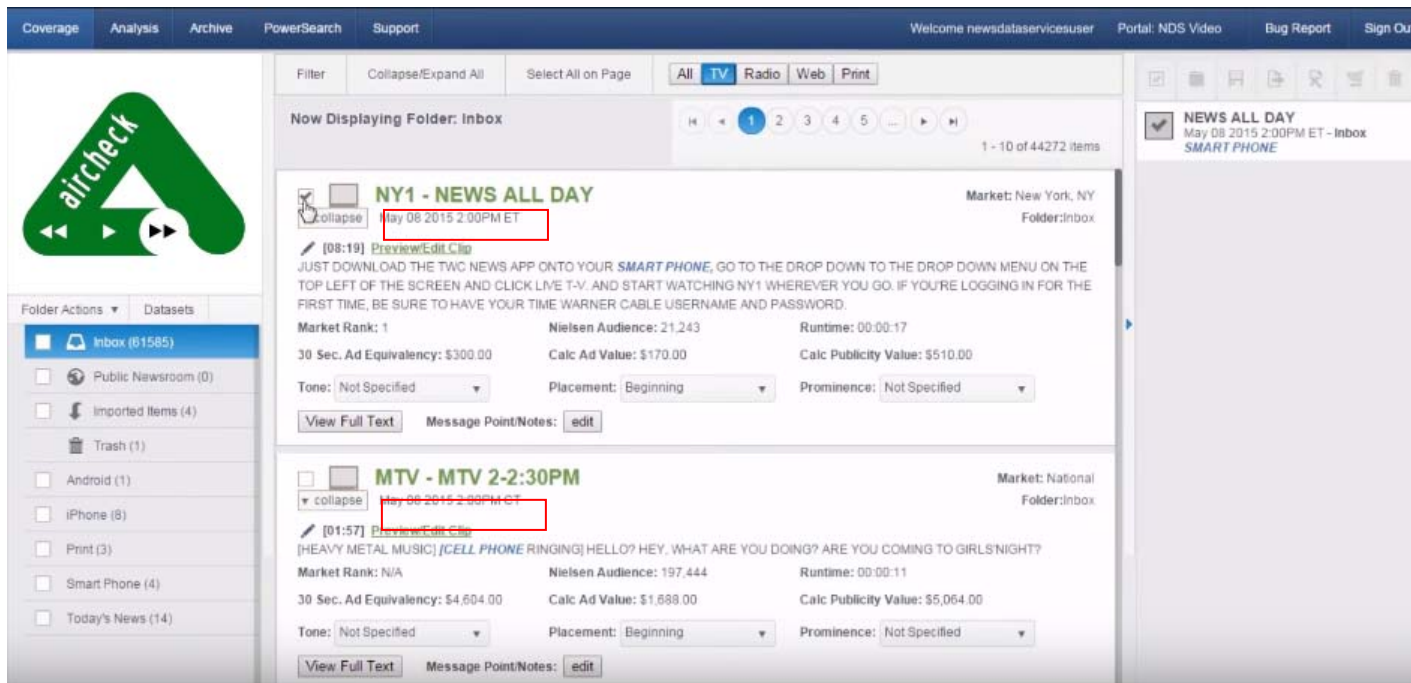
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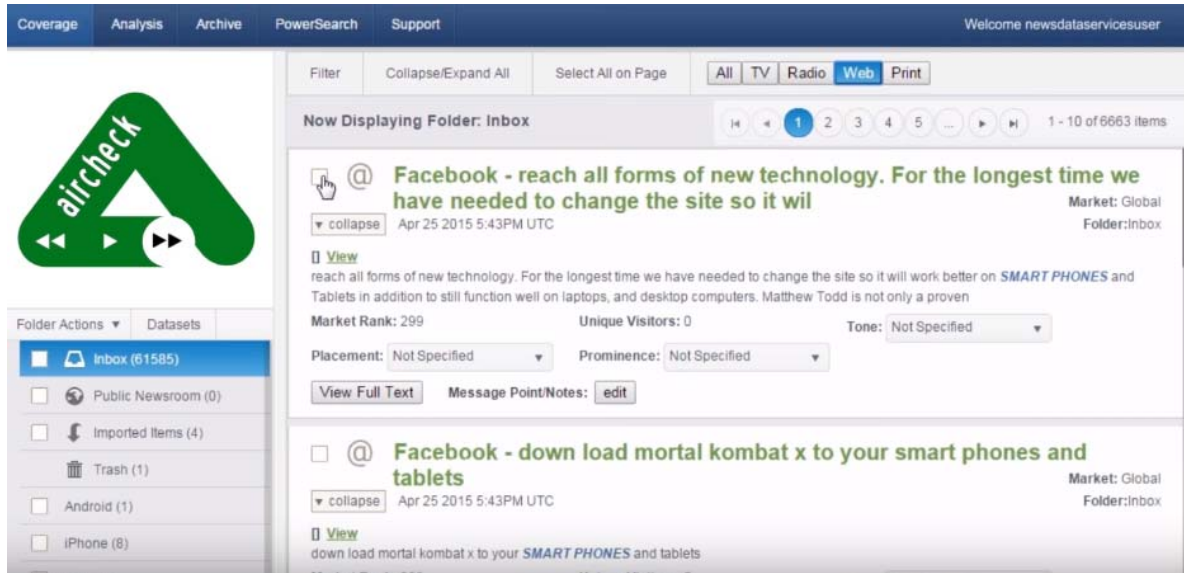
151	Joplin-Pittsburg	176	Jackson, TN	201	St. Joseph
152	Albany, GA	177	Harrisonburg	202	Fairbanks
153	Rochestr-Mason City-Austin	178	Watertown	203	Victoria
154	Panama City	179	Alexandria, LA	204	Zanesville
155	Terre Haute	180	Marquette	205	Helena
156	Bangor	181	Bowling Green	206	Presque Isle
157	Biloxi-Gulfport	182	Jonesboro	207	Juneau
158	Wheeling-Steubenville	183	Charlottesville	208	Alpena
159	Bluefield-Beckley-Oak Hill	184	Laredo	209	North Platte
160	Binghamton	185	Butte-Bozeman	210	Glendive
161	Gainesville	186	Grand Junction-Montrose		

Source: <https://airchecknews.com/coverage>

12. AirCheck performs and induces other to perform the step of building list of candidates for time stamp for each paragraph by extraction of valid triads representing year, month and day. For example, the AirTrack On-Demand Portal builds the index of headings and/or titles (“candidates”) for each of the paragraph with a valid extracted timestamp. The timestamp contains the year, month and day (“triad”).



Source: https://www.youtube.com/watch?time_continue=36&v=e0JG9nZTY_o



Source: https://www.youtube.com/watch?time_continue=36&v=e0JG9nZTY_o

13. In the alternative, because the manner of use by Defendant differs in no substantial way from language of the claims, if Defendant is not found to literally infringe, Defendant infringes under the doctrine of equivalents.

14. Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

15. In addition to what is required for pleadings in patent cases, and to the extent any marking was required by 35 U.S.C. § 287, Plaintiff and all predecessors in interest to the ‘661 Patent complied with all marking requirements under 35 U.S.C. § 287.

16. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of the Defendant’s wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II
INFRINGEMENT OF U.S. PATENT NO. 8,620,848

17. Plaintiff is the owner of United States Patent No. 8,620,848 (“the ‘848 patent”) entitled “System and Method for Facts Extraction and Domain Knowledge Repository Creation From Unstructured and Semi-Structured Documents.” The ‘848 Patent issued on December 31, 2013. A true and correct copy of the ‘848 Patent is attached as Exhibit B.

18. Defendant owns, uses, operates, advertises, controls, sells, and otherwise provides products and/or services that infringe the ‘848 patent. The ‘848 patent provides, among other things, “A method for extraction of very important numbers and objects that are associated with from a page comprising: determining paragraphs and tables containing numbers; and extracting the numbers.”

19. Defendant directly and/or through intermediaries, made, has made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or services that infringed one or more claims of the ‘848 patent, including at least Claim 2, in this district and elsewhere in the United States. By making, using, importing, offering for sale, and/or selling such products and services, and all like products and services, Defendant has injured Plaintiff and is thus liable for infringement of the ‘848 patent pursuant to 35 U.S.C. § 271.

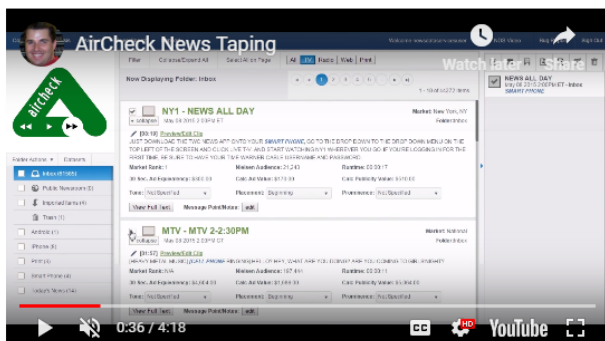
20. AirCheck performs and induces others to perform a method for extraction of very important numbers and objects that are associated with from a page. For example, AirCheck provides AirTrack On-Demand Portal for media monitoring to extract the Runtime, Nielsen audience, Ad value, Publicity value, 30 Sec. Ad Equivalency and/or timestamp (“very important numbers”). The Portal also tracks Unique Visitors (“very important numbers”) from Facebook and/or Twitter.



Home Services Coverage Contact

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AirCheck Media Monitoring



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Source: <https://airchecknews.com/services>



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The screenshot displays the Aircheck web application interface. On the left is a sidebar with the Aircheck logo and a folder tree. The main content area shows a list of broadcast items. Two items are highlighted with red boxes, showing their details:

Item	Market	Folder	Date/Time	Runtime	Nielsen Audience	Calc Ad Value	Calc Publicity Value
NY1 - NEWS ALL DAY	New York, NY	Inbox	May 08 2015 2:00PM ET	00:00:17	21,243	\$170.00	\$510.00
MTV - MTV 2-2:30PM	National	Inbox	May 08 2015 2:00PM CT	00:00:11	197,444	\$1,688.00	\$5,064.00

Additional details for the highlighted items include Market Rank, 30 Sec. Ad Equivalency, and Tone. The interface also includes a search bar, filter options, and a list of folders on the left sidebar.

Source: https://www.youtube.com/watch?time_continue=36&v=e0JG9nZTY_o

WTOP-FM - Radio Programming Market: Washington, DC-Hagerstown, MD
 May 08 2015 10:45PM ET Folder: Inbox

[00:46] [Preview/Edit Clip](#)

WAS SEVERELY INJURED WHILE IN POLICE CUSTODY. UNTIL LATE IN THE SEARCH FOR MISSING GRAD STUDENT FROM HOWARD POLICE BELIEVE LANCE WHAT WE MAY HAVE GONE MONTGOMERY COUNTY FOR WHILE BUCKLEY CELL PHONE WAS WHICH AND BRIEFLY IN WESTERN MONTGOMERY COUNTY AT THAT POINT ABOUT MECHANIC POLICE DEPARTMENT ISSUED A SEARCH THAT AREA OF A REPORT AT THIS POINT ON

Market Rank: 8	Arbitron Audience: 13,600	Runtime: 00:00:19
30 Sec. Ad Equivalency: \$209.00	Calc Ad Value: \$132.00	Calc Publicity Value: \$397.00
Tone: Not Specified	Placement: Beginning	Prominence: Not Specified

[View Full Text](#) [Message Point/Notes](#) [edit](#)

NBC - Today Show Market: National
 May 08 2015 10:30AM ET Folder: Inbox

[03:17] [Preview/Edit Clip](#)

INSTEAD OF YOUR BAG GETTING SOAKED WHEN IT RAINS YOU PUT THIS OVER YOUR HANDBAG THE VELCRO FITS AROUND ANY

Source: https://www.youtube.com/watch?time_continue=36&v=e0JG9nZTY_o

Coverage Analysis Archive PowerSearch Support Welcome newdataservicesuser Portal: NDS Video Bug Report Sign Out

Filter Collapse/Expand All Select All on Page All TV **Radio** Web Print

Now Displaying Folder: Inbox 1 - 10 of 10647 items

Wall Street Journal Radio - Wall Street Journal Report Market: National
 May 08 2015 2:15PM CT Folder: Inbox

[00:11] [Preview/Edit Clip](#)

DEPENDENT ON WHICH SIDE OF THE FENCE YOU ARE ON THIS COULD BE GREAT NEWS OR HORRIBLE NEWS TODAY A FEDERAL APPEALS COURT RULED THE ACT A A WAS WITHIN ITS AUTHORITY ALLOWING AIRLINE PASSENGERS TO USE *CELL PHONES* AND OTHER SMALL ELECTRONICS DURING TAKEOFFS AND LANDINGS THE NATION'S LARGEST FLIGHT ATTENDANTS UNION THAT CHALLENGE THE MOVE. ARGUING THAT SUCH DEVICES AND DISTRACT PASSENGERS FROM SAFETY ANNOUNCEMENTS HAVE BECOME DANGEROUS PROJECT ALSO. *CELL PHONES* STILL HAVE TO BE AN AIRPLANE MODE WHEN THEY USE. THAT DAY IS GOING PUBLIC TO MAKE SURE WHERE ALL ACTIVITY TRACKER HAS FILED PAPERWORK FOR AN INITIAL PUBLIC OFFERING A PLAN TO RAISE UP TO ONE HUNDRED MILLION DOLLARS. RETAIL SALES OF FITNESS TRACKER IS MORE THAN DOUBLED LAST YEAR

Market Rank: N/A	Arbitron Audience: 0	Runtime: 00:00:44
30 Sec. Ad Equivalency: \$0.00	Calc Ad Value: \$0.00	Calc Publicity Value: \$0.00
Tone: Not Specified	Placement: Beginning	Prominence: Not Specified

[View Full Text](#) [Message Point/Notes](#) [edit](#)

KYW-AM - KYW News Market: Philadelphia, PA
 May 08 2015 1:15PM ET Folder: Inbox

[14:08] [Preview/Edit Clip](#)

OF EIGHTY FOUR THIS AFTERNOON THEY WANT WHICH IS TIME ONE TWENTY SEVEN. THE STATE DO NOT SETTLE FOR ANYTHING LESS THAN HORIZON. STILL NOT HOW MUCH HE MATTERS WITH A GREAT GIFT ON THE LARGEST MOST RELIABLE FOR TLC THE NETWORK GAVE TWO HUNDRED DOLLARS OR MORE WHEN YOU TREATING ANY *SMART PHONE* AND PURCHASE THE SAMSUNG

aircheck

Folder Actions Datasets

- Inbox (61585)
- Public Newsroom (0)
- Imported Items (4)
- Trash (1)
- Android (1)
- iPhone (8)
- Print (3)
- Smart Phone (4)
- Today's News (14)

NEWS ALL DAY May 08 2015 2:00PM ET - Inbox
SMART PHONE

MTV 2-2:30PM May 08 2015 2:00PM CT - Inbox
CELL PHONE

Source: https://www.youtube.com/watch?time_continue=36&v=e0JG9nZTY_o

The screenshot shows the AirCheck software interface. The top navigation bar includes 'Coverage', 'Analysis', 'Archive', 'PowerSearch', and 'Support'. The main content area displays a folder named 'Smart Phone' with four items. The first item is a Facebook post from 'Videocon A48 (White) Kerala Online Shop' dated April 11, 2015, 1:27 PM UTC. The second item is a Twitter post from '@arynewsocial' dated April 10, 2015, 3:17 PM ET. The third item is a YouTube video titled 'HOW TO MAKE A DOSHA'. The fourth item is partially visible. The interface includes a sidebar with folder actions, a top navigation bar, and a main content area with item details and analytics.

Source: https://www.youtube.com/watch?time_continue=36&v=e0JG9nZTY_o

21. AirCheck performs and induces others to perform the step of determining paragraphs and tables containing numbers; and extracting the numbers. For example, the AirTrack On-Demand Portal determines the posts (“paragraphs and tables”) and extracts the Runtime, Nielsen audience, Ad value, Publicity value, 30 Sec. Ad Equivalency, Arbitron Audience and/or timestamp (“numbers”).

The screenshot shows the AirCheck software interface. The top navigation bar includes 'Coverage', 'Analysis', 'Archive', 'PowerSearch', and 'Support'. The main content area displays a folder named 'Inbox' with two items. The first item is a NY1 news segment titled 'NY1 - NEWS ALL DAY' dated May 06, 2015, 2:00 PM ET. The second item is an MTV video titled 'MTV - MTV 2-2:30PM' dated May 06, 2015, 2:00 PM ET. The interface includes a sidebar with folder actions, a top navigation bar, and a main content area with item details and analytics.

Source: https://www.youtube.com/watch?time_continue=36&v=e0JG9nZTY_o

WTOP-FM - Radio Programming
Market: Washington, DC-Hagerstown, MD
Folder: Inbox
May 08 2015 10:45PM ET

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Tone: Not Specified	Placement: Beginning	Prominence: Not Specified

View Full Text Message Point/Notes: edit

NBC - Today Show
Market: National
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Wall Street Journal Radio - Wall Street Journal Report
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Tone: Not Specified	Placement: Beginning	Prominence: Not Specified

View Full Text Message Point/Notes: edit

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Market: Philadelphia, PA
Folder: Inbox
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[14:08] Preview/Edit Clip
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22. In the alternative, because the manner of use by Defendant differs in no substantial way from language of the claims, if Defendant is not found to literally infringe, Defendant infringes under the doctrine of equivalents.

23. Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

24. In addition to what is required for pleadings in patent cases, and to the extent any marking was required by 35 U.S.C. § 287, Plaintiff and all predecessors in interest to the '848 Patent complied with all marking requirements under 35 U.S.C. § 287.

25. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of the Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

1. A judgment in favor of Plaintiff that Defendant has infringed the '661, and '848 Patents;
2. A judgment and order requiring Defendant to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '661, and '848 Patents as provided under 35 U.S.C. § 284;
3. An award to Plaintiff for enhanced damages resulting from the knowing, deliberate, and willful nature of Defendant's prohibited conduct with notice being made at least as early as the date of the filing of this Complaint, as provided under 35 U.S.C. § 284;
4. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees; and
5. Any and all other relief to which Plaintiff may show itself to be entitled.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Respectfully Submitted,

RECURSIVE WEB TECHNOLOGIES LLC

/s/ Papool S. Chaudhari

Dated: March 30, 2019

By: _____
Papool S. Chaudhari
Texas State Bar No. 24076978
Chaudhari Law, PLLC

P.O. Box 1863
Wylie, Texas 75098
Phone: (214) 702-1150
Fax: (214) 705-3775
Papool@ChaudhariLaw.com

**ATTORNEY FOR PLAINTIFF
RECURSIVE WEB TECHNOLOGIES LLC**